

# **Exhibit 2**

Defendants' Privilege Log

<u>Control No.</u> <u>Bates No.</u>	<u>Document</u> <u>Type</u>	<u>Date</u>	<u>From</u>	<u>Recipient(s)</u>	<u>CC</u>	<u>Description</u>	<u>Privilege Claim</u>
DOCID00002354-2355	Email	2/5/2016	Valerie Dixon	Mark Jones; Jessica Armstead	Natalia Ostroveanu	Email reflecting legal advice regarding Iporre Answer and Grounds, with attached Answer. (Email forwards legal advice in email from S. Earman, Esq.)	Attorney-Client; Work-Product
DOCID00002364	Email	1/6/2016	Valerie Dixon	Josephine Giambanco; Mark Jones	Jessica Armstead	Email discussing legal advice from Susan Earman, Esq. (Email discussing legal strategy re Escobar and Hurtado litigation after question from S. Earman, Esq.)	Attorney-Client; Work-Product
DOCID00013223	Emails	3/3/2016	Susan Earman, Esq.	Jessica Armstead	N/A	Email providing legal advice regarding criminal background check policy.	Attorney-Client
DOCID00013809-13812	Email	2/11/2016	Jessica Armstead	Josephine Giambanco; Susan Earman, Esq.; Valerie Dixon	Melanie Conley; Mark Jones; Jessica Armstead	Email providing documents at the direction of attorney in connection with seeking legal advice regarding court proceedings, with attached leaseholder applications.	Attorney-Client; Work-Product
DOCID00014462	Email	1/6/2016	Josephine Giambanco	Valerie Dixon; Mark Jones	Jessica Armstead	Email reflecting legal advice provided by Susan Earman, Esq. regarding court proceedings. (Email discussing legal strategy re Escobar and Hurtado litigation after question from S. Earman, Esq.)	Attorney-Client; Work-Product
DOCID00015272	Email	12/14/2015	Susan Earman, Esq.	Josephine Giambanco; Jessica Armstead	Mark Jones	Email requesting information in connection with providing legal advice regarding Waples MHP.	Attorney-Client; Work-Product
DOCID00015320-15321	Email	2/11/2016	Josephine Giambanco	Susan Earman, Esq.; Jessica Armstead; Valerie Dixon	Melanie Conley; Mark Jones	Email responding to legal advice regarding court proceedings, with attached report.	Attorney-Client; Work-Product

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DOCID00015322-15323	Email	2/11/2016	Josephine Giambanco	Susan Earman, Esq.; Jessica Armstead; Valerie Dixon	Melanie Conley; Mark Jones	Email providing document at the direction of attorney in connection with seeking legal advice regarding court proceedings, with attached leaseholder application.	Attorney-Client; Work-Product
DOCID00015324	Email	2/11/2016	Susan Earman, Esq.	Jessica Armstead; Valerie Dixon	Josephine Giambanco; Melanie Conley; Mark Jones	Email requesting information in connection with providing legal advice regarding court proceedings and criminal background checks.	Attorney-Client; Work-Product
DOCID00015338	Email	12/22/2015	Susan Earman, Esq.	Mark Jones; Jessica Armstead; Valerie Dixon	Josephine Giambanco	Email providing legal advice regarding court proceedings and lease requirements.	Attorney-Client; Work-Product
DOCID00015339	Email	12/22/2015	Susan Earman, Esq.	Jessica Armstead; Valerie Dixon	Josephine Giambanco; Mark Jones	Email providing legal advice regarding litigation issues.	Attorney-Client
DOCID00026185	Email	3/3/2016	Jessica Armstead	Michael Dean, Esq.; Mark Jones	N/A	Email forwarding information reflecting communications and legal advice from Susan Earman, Esq. regarding strategy.	Attorney-Client; Work-Product
DOCID00026186	Email	3/3/2016	Jessica Armstead	Mark Jones	N/A	Email forwarding information reflecting legal advice from Susan Earman, Esq. regarding strategy. (Email discussing legal strategy in Hurtado litigation in response to inquiry from S. Earman, Esq.)	Attorney-Client; Work-Product
DOCID00029545	Email	12/23/2015	Jessica Armstead	Mark Jones	N/A	Email providing information in response to legal advice from Susan Earman, Esq. regarding court proceedings. (Email discussing Escobar litigation in response to inquiry from S. Earman, Esq.)	Attorney-Client; Work-Product

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DOCID00054251	Email	1/6/2016	Valerie Dixon	Mark Jones	Josephine Giambanco; Jessica Armstead	Email responding to legal advice from Susan Earman, Esq. regarding court proceedings. (Email discussing legal strategy in Escobar litigation in response to inquiry from S. Earman, Esq.)	Attorney-Client; Work-Product
DOCID00054252	Email	1/6/2016	Mark Jones	Valerie Dixon	Josephine Giambanco; Jessica Armstead	Email providing information at the direction of Susan Earman, Esq. regarding court proceedings.	Attorney-Client; Work-Product
DOCID00054397	Email	12/22/2015	Valerie Dixon	Josephine Giambanco	N/A	Email requesting information re Escobar litigation at the direction of Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID00066105; WAPLES0000142 8	Report	N/A	N/A	N/A	N/A	Personal identifying information.	Personal Identifiers
DOCID00066442- 66445	Email	7/18/2016	Josephine Giambanco	Susan Earman, Esq.; Valerie Dixon	N/A	Email attaching lease documents at the direction of attorney re Hurtado and Iporre litigation	Attorney-Client; Work-Product
DOCID00067523- 67524	Email	3/11/2016	Josephine Giambanco	Susan Earman, Esq.	Valerie Dixon	Email seeking legal advice regarding tenant documents, with attached letter.	Attorney-Client
DOCID00067769; WAPLES0000143 5-1437	Report	2/11/2016	Josephine Giambanco	N/A	N/A	Communications with attorney, directions from attorney. (discussing communications had with S. Earman, Esq. re ongoing litigation and upcoming trial; discusses strategy re ongoing litigation)	Attorney-Client; Work-Product
DOCID00068324	Email	12/22/2015	Josephine Giambanco	Valerie Dixon	N/A	Email responding to information request from Susan Earman, Esq. regarding tenant documents re Escobar litigation	Attorney-Client; Work-Product
DOCID00068330	Email	12/22/2015	Josephine Giambanco	Valerie Dixon	N/A	Email responding to information request from Susan Earman, Esq. regarding tenant documents re Escobar litigation	Attorney-Client; Work-Product

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DOCID00151148; WAPLES0000147 0	Email	7/28/2011	Sabiha Noorzai	Daily Reports - Residential	N/A	Communications with Michael Dean, Esq.	Attorney-Client
DOCID00155023	Email	9/14/2011	Julia Edwards	Peter Williams; Albert J. Dwoskin	Michael Dean, Esq.	Email communications with attorney regarding criminal background checks.	Attorney-Client
DOCID00258294	Email	8/29/2016	Michael Dean, Esq.	Albert J. Dwoskin	Michael McGregor	Email communications with attorney regarding Priority Items. (discusses status of current litigation and provides legal advice re current litigation)	Attorney-Client
DOCID00259190	Email	8/22/2016	Michael Dean, Esq.	Albert J. Dwoskin	Michael McGregor	Email communications with attorney regarding Priority Items. (discusses status of current litigation and provides legal advice re current litigation)	Attorney-Client
DOCID00286133; WAPLES0000148 5-1487	Report	12/4/2015	Josephine Giambanco	N/A	N/A	Communications regarding status of onoging court proceedings.	Attorney-Client; Work-Product
DOCID00484346	Email	6/10/2016	Mark Jones	Michael Dean, Esq.; Carolina Easton	N/A	Email providing information in connection with seeking legal advice regarding resident screening in regards to current litigation	Attorney-Client; Work-Product
DOCID00484635	Email	12/23/2015	Susan Earman, Esq.	Mark Jones; Jessica Armstead; Valerie Dixon	Josephine Giambanco; Carolina Easton	Email communications with client regarding court proceedings.	Attorney-Client
DOCID00484637	Email	12/23/2015	Susan Earman, Esq.	Mark Jones; Jessica Armstead; Valerie Dixon	Josephine Giambanco; Carolina Easton	Email providing legal advice regarding court proceedings.	Attorney-Client
DOCID00486508	Email	3/24/2016	Josephine Giambanco	Susan Earman, Esq.; Valerie Dixon; Jessica Armstead; Carolina Easton	N/A	Email responding to legal advice regarding application requirements.	Attorney-Client
DOCID00486547	Email	3/18/2016	Josephine Giambanco	Carolina Easton	Mark Jones; Jessica Armstead; Josephine Giambanco	Email providing information at the direction of Susan Earman, Esq. regarding notices.	Attorney-Client; Work-Product

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DOCID00491211-491213	Email	9/19/2016	Natalia Ostroveanu	Carolina Easton; Mark Jones	N/A	Email providing background information in connection with seeking legal advice, with attached tenant report. (Email gathering information collected at direction of Reed Smith for current litigation)	Attorney-Client; Work-Product
DOCID00491216-491218	Email	9/19/2016	Natalia Ostroveanu	Mark Jones; Carolina Easton	N/A	Email providing background information in connection with seeking legal advice, with attached tenant reports. (Email gathering information collected at direction of Reed Smith for current litigation)	Attorney-Client; Work-Product
DOCID00518794-518796	Email	7/18/2016	Valerie Dixon	Carolina Easton	N/A	Email forwarding information regarding court proceedings, with attached hearing transcript and draft interrogatory responses. (Email forwards attorney-client work product)	Attorney-Client; Work-Product
DOCID00518878-518879	Email	4/18/2016	Susan Earman, Esq.	Valerie Dixon; Josephine Giambanco; Michael Dean, Esq.; Carolina Easton	N/A	Email providing legal advice regarding attached draft responses.	Attorney-Client; Work-Product
DOCID00518905-518906	Email	4/4/2016	Valerie Dixon	Carolina Easton; Jessica Armstead	N/A	Email forwarding discovery from Susan Earman.	Attorney-Client; Work-Product
DOCID00518914-518915	Email	3/11/2016	Valerie Dixon	Jessica Armstead; Carolina Easton	Mark Jones	Email forwarding information provided by Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID00518920	Email	3/3/2016	Josephine Giambanco	Valerie Dixon; Susan Earman, Esq.	Carolina Easton	Email communications with attorney regarding court proceedings.	Attorney-Client
DOCID00518924	Email	3/3/2016	Susan Earman, Esq.	Carolina Easton; Jessica Armstead	N/A	Email providing legal advice regarding court proceedings.	Attorney-Client
DOCID00518925	Email	3/3/2016	Josephine Giambanco	Jessica Armstead; Valerie Dixon; Susan Earman, Esq.; Yuliana Salazar; Sharon Clark	Carolina Easton; Adriana Swinson; Natalia Ostroveanu	Email responding to legal advice regarding court proceedings.	Attorney-Client

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DOCID00518926	Email	3/3/2016	Jessica Armstead	Susan Earman, Esq.; Carolina Easton	N/A	Email seeking legal advice regarding court proceedings.	Attorney-Client
DOCID00518929	Email	3/3/2016	Susan Earman, Esq.	Josephina Giambanco; Valerie Dixon; Jessica Armstead; Yuliana Salazar; Sharon Clark	Carolina Easton; Adriana Swinson; Natalia Ostroveanu	Email providing legal advice regarding court proceedings.	Attorney-Client
DOCID00518966-518967	Email	2/22/2016	Valerie Dixon	Carolina Easton	N/A	Email forwarding legal advice from S. Earman, Esq. and hearing transcript from Susan Earman, Esq. re Iporre litigation	Attorney-Client; Work-Product
DOCID00518989	Email	1/4/2016	Valerie Dixon	Mark Jones	Josephine Giambanco; Jessica Armstead; Carolina Easton	Email forwarding legal advice from Susan Earman, Esq. regarding court proceedings.	Attorney-Client; Work-Product
DOCID00525604	Email	3/3/2016	Carolina Easton	Susan Earman, Esq.	Jessica Armstead	Email providing information at the request of attorney regarding court proceedings.	Attorney-Client
DOCID00566004	Email	9/23/2016	Susan Earman, Esq.	Michael Dean, Esq.; Mark Jones	N/A	Email forwarding article in connection with providing legal advice.	Attorney-Client
DOCID00568794-568795	Email	8/30/2016	Michael Dean, Esq.	Brady Bustany	Mark Jones	Email forwarding information at direction of Reed Smith, with attached Order of Stay.	Attorney-Client; Work-Product
DOCID00568887	Email	8/29/2016	Brady Bustany	Mark Jones	N/A	Email providing information in connection with seeking legal advice regarding resident screening. Email contact undertaken as investigation as result of Reed Smith's direction	Attorney-Client; Work-Product
DOCID00568915	Email	8/29/2016	Michael Dean, Esq.	Mark Jones	N/A	Email discussing updating Reed Smith regarding information regarding resident screening	Attorney-Client

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DOCID00569569	Email	8/22/2016	Patrick Hennessey	Mark Jones	Brady Bustany	Email providing information in connection with seeking legal advice regarding resident screening. Email contact undertaken as investigation as result of Reed Smith's direction	Attorney-Client; Work-Product
DOCID00575917-575918	Email	6/24/2016	"canon1"	Mark Jones	N/A	Interrogatories scanned in for the purpose of sending to Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID00575919-575920	Email	6/24/2016	Susan Earman, Esq.	Mark Jones	N/A	Email providing legal advice regarding attached interrogatory responses.	Attorney-Client; Work-Product
DOCID00575922-575923	Email	6/24/2016	"canon1"	Mark Jones	N/A	Interrogatories scanned in for the purpose of sending to Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID00577576	Email	6/9/2016	Patrick Hennessey	Mark Jones	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00577620	Email	6/9/2016	Patrick Hennessey	Mark Jones	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00577714	Email	6/8/2016	Patrick Hennessey	Mark Jones; Amy Gerritsen	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product



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DOCID00577718	Email	6/8/2016	Amy Gerritsen	Mark Jones	Patrick Hennessey	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00649814-649815	Email	7/6/2016	"canon1"	Mark Jones	N/A	Interrogatories scanned in for the purpose of sending to Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID00650026	Email	8/29/2016	Brady Bustany	Mark Jones	N/A	Email providing information in connection with seeking legal advice regarding resident screening. Email contact undertaken as result of Reed Smith's direction	Attorney-Client; Work-Product
DOCID00653346	Email	6/8/2016	Mark Jones	Patrick Hennessey; Amy Gerritsen	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00657329	Email	9/19/2016	Mark Jones	Brady Bustany	Michael Dean, Esq.; Michael Dingman, Esq.	Email providing information in connection with seeking legal advice regarding resident screening.	Attorney-Client; Work-Product
DOCID00657871-657872	Email	9/19/2016	Mark Jones	Michael Dingman, Esq.	Brady Bustany; Michael Dean, Esq.	Email requesting legal advice regarding resident screening.	Attorney-Client; Work-Product
DOCID00658337-658338	Email	8/29/2016	Mark Jones	Brady Bustany	N/A	Email providing information in connection with seeking legal advice regarding resident screening. Email contact undertaken as a result of Reed Smith's direction	Attorney-Client; Work-Product
DOCID00660174-660175	Email	6/24/2016	Mark Jones	Susan Earman, Esq.	N/A	Email forwarding attached interrogatory responses.	Attorney-Client; Work-Product
DOCID00660176-660177	Email	6/24/2016	Mark Jones	Susan Earman, Esq.	Michael Dean, Esq.	Email forwarding attached interrogatory responses.	Attorney-Client; Work-Product

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DOCID00660653-660654	Email	6/9/2016	Mark Jones	Patrick Hennessey	N/A	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00660698	Email	6/8/2016	Mark Jones	Amy Gerritsen	Patrick Hennessey	Email providing information in connection with seeking legal advice regarding resident screening. (Investigation undertaken at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00660922-660926	Email	5/26/2016	Mark Jones	Kevin Ortega	N/A	Email requesting information at the direction of Reed Smith regarding current lawsuit and regarding lease renewals, with attachments.	Attorney-Client; Work-Product
DOCID00663792-663794	Email	2/5/2016	Mark Jones	Michael Dean, Esq.	N/A	Email seeking legal advice regarding Iporre Answer and Grounds, with attached Answer.	Attorney-Client; Work-Product
DOCID00698473-6988475	Email	9/23/2016	Mark Jones	Mark Jones	N/A	Email forwarding article from Susan Earman, Esq. in connection with seeking legal advice re current lawsuit	Attorney-Client; Work-Product
DOCID00699442-699463	Email	9/8/2016	N/A	Carolina Easton	Natalia Ostroveanu	Draft email forwarding information in connection with seeking legal advice regarding credit checks, with attached tenant reports. (collecting information at direction of Reed Smith)	Attorney-Client; Work-Product
DOCID00807426-807428	Email	9/5/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching draft reports, which discuss status of current litigation and provide advice regarding current litigation	Attorney-Client; Work-Product
DOCID00807744-807746	Email	8/28/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching draft reports, which discuss status of current litigation and provide advice regarding current litigation	Attorney-Client; Work-Product

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DOCID00808163-808164	Email	7/29/2016	"canon2"	Michael Dean, Esq.	N/A	Scanned email attaching letter from VOICE regarding tenant evictions.	Attorney-Client; Work-Product
DOCID00808684-808685	Email	7/29/2016	"canon2"	Michael Dean, Esq.	N/A	Scanned email attaching letter from Senate of Virginia regarding tenant evictions.	Attorney-Client; Work-Product
DOCID00899916; 899918-899920	Email	9/2/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching Daily Commercial Reports and Priority Items from Michael Dean, Esq. to Dwoskin management. The draft reports discuss status of current litigation and provide advice regarding current litigation. Also discusses communications with Reed Smith re current litigation	Attorney-Client
DOCID00900095-900098	Email	8/23/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching Daily Commercial Reports and Priority Items from Michael Dean, Esq. to Dwoskin management. The draft reports discuss status of current litigation and provide advice regarding current litigation.	Attorney-Client
DOCID00900199-900205	Email	8/19/2016	Michael Dean, Esq.	Michael Dean, Esq.	N/A	Email attaching Daily Commercial Reports and Priority Items from Michael Dean, Esq. to Dwoskin management. The draft reports discuss status of current litigation and provide advice regarding current litigation.	Attorney-Client
DOCID01073509	Email	1/7/2016	Natalia Ostroveanu	Valerie Dixon	N/A	Email providing information in response to legal advice from Susan Earman, Esq. regarding court hearing.	Attorney-Client; Work-Product
DOCID01089512-1089517	Email	6/29/2016	Susan Earman, Esq.	Valerie Dixon	N/A	Email providing legal advice regarding hearing, with attached hearing transcript.	Attorney-Client; Work-Product

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DOCID01089518-1089523	Email	6/29/2016	Susan Earman, Esq.	Valerie Dixon	N/A	Email providing legal advice regarding hearing, with attached hearing transcript.	Attorney-Client; Work-Product
DOCID01089537-1089540	Email	3/2/2016	Alan Zhou	Valerie Dixon	N/A	Email forwarding documents on behalf of Susan Earman, Esq., with attached Answer, Memorandum, and Praecipe.	Attorney-Client; Work-Product
DOCID01091965-1091966	Email	7/6/2016	Alan Zhou	Valerie Dixon	Susan Earman, Esq.	Email forwarding attached work product to client on behalf of Susan Earman, Esq.	Attorney-Client; Work-Product
DOCID01092875	Email	1/19/2016	Susan Earman, Esq.	Valerie Dixon	N/A	Email providing legal advice regarding court proceedings and lease issues.	Attorney-Client
DOCID01092887	Email	1/6/2016	Susan Earman, Esq.	Valerie Dixon	N/A	Email providing legal advice regarding court proceedings.	Attorney-Client
DOCID01092965	Email	12/22/2015	Susan Earman, Esq.	Valerie Dixon	N/A	Email providing legal advice regarding court proceedings.	Attorney-Client
DOCID01103281-1103283	Email	2/11/2016	Valerie Dixon	Susan Earman, Esq.	N/A	Email providing information at the direction of attorney regarding court proceedings, with attached resident information guides.	Attorney-Client; Work-Product
DOCID01103524	Email	1/19/2016	Valerie Dixon	Susan Earman, Esq.	N/A	Email responding to legal advice regarding court proceedings.	Attorney-Client
DOCID01103636	Email	1/7/2016	Valerie Dixon	Natalia Ostroveanu	N/A	Email forwarding information in connection with legal advice provided by Susan Earman, Esq. regarding court hearing.	Attorney-Client; Work-Product
DOCID01103649	Email	1/6/2016	Valerie Dixon	Susan Earman, Esq.	N/A	Email forwarding information in connection with seeking legal advice regarding court proceedings and lease requirements.	Attorney-Client; Work-Product
DOCID01103761	Email	12/22/2015	Valerie Dixon	Susan Earman, Esq.	N/A	Email forwarding information in connection with seeking legal advice regarding court proceedings and lease requirements.	Attorney-Client; Work-Product